

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

UNITED STATES OF AMERICA,)	
Plaintiff,)	
)	23 CR 28
v.)	Honorable Edmond E. Chang
)	
JEFF McGRAW,)	
Defendant.)	

JOINT STATUS REPORT

NOW COMES the defendant, JEFF McGRAW, by and through his attorney, YELENA A. DOLGOSHEEVA, and the UNITED STATES OF AMERICA, by MORRIS PASQUAL, Acting United States Attorney for the Northern District of Illinois, and hereby file this joint status report.

1. On February 14, 2024, Mr. McGraw notified the undersigned defense counsel that he will not be retaining a private attorney or representing himself, at this time. During the same communication, Mr. McGraw raised several issues, which might require counsel to conduct legal research and investigation.

2. The government has agreed to re-produce discovery to defense counsel. The government will send two copies of discovery—one for the defense counsel and one for the defendant.

3. It is defense counsel’s understanding that discovery in this case includes body-worn camera video footage, law enforcement reports, and audio recordings of jail calls.

4. Counsel has reviewed this case’s docket, including orders, pleadings, and the transcript of the hearing on defendant’s motion for bond, and has submitted to this Court a request to approve payment for a transcript of the hearing regarding the government’s emergency motion to revoke Magistrate Judge Kim’s release order. Additionally, defense counsel contacted the U.S.

Marshals Service regarding defendant's medical treatment, specifically a delay in cystoscopy and surgery to remove metal objects (likely bullet fragments) from his bladder.

5. The parties have conferred and propose the following briefing schedule for defendant's motion to dismiss the indictment:

- a. Defendant's motion to dismiss is to be filed on or before April, 16, 2024;
- b. Government's response is to be filed on or before April 30, 2024; and
- c. Defendant's reply brief is to be filed on or before May 14, 2024.

6. The government requests that the Court set a trial date in this case. The government anticipates that its presentation at trial will take no more than two days.

7. The parties further request for the Court to strike status hearing scheduled for February 22, 2024, and order the parties to file a detailed joint status report approximately two weeks after the anticipated ruling on defendant's motion to dismiss the indictment.

Respectfully submitted,

/s/ Yelena A. Dolgosheeva

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